

ORIGINAL
RECEIVED
MEMORANDUM



0000011261

30

2004 AUG 23 A 9:04

AZ CORP COMMISSION
DOCUMENT CONTROL

TO: Docket Control

FROM: Ernest G. Johnson
Director
Utilities Division

DATE: August 23, 2004

RE: IN THE MATTER OF THE APPLICATION OF OCMC, INC. TO OBTAIN A
CERTIFICATE OF CONVENIENCE AND NECESSITY FROM ONE CALL
COMMUNICATIONS, INC. DBA OPTICOM TO PROVIDE
TELECOMMUNICATIONS SERVICES AS A PROVIDER OF RESOLD
INTEREXCHANGE SERVICES AND ALTERNATIVE OPERATOR SERVICES
WITHIN THE STATE OF ARIZONA (DOCKET NOS. T-04103A-02-0274 AND T-
02565A-02-0274)

Attached is a Supplemental Staff Report for the above referenced application. The purpose of this report is to address the Applicant's request for a waiver pursuant to A.A.C. R14-2-1006.

EGJ/DWS/red

Originator: Del Smith

Attachment: Original and Sixteen Copies

Arizona Corporation Commission
DOCKETED

AUG 23 2004

DOCKETED BY	
-------------	--

SUPPLEMENTAL STAFF REPORT
UTILITIES DIVISION
ARIZONA CORPORATION COMMISSION

OCMC, INC. AND ONE CALL COMMUNICATIONS, INC. DBA OPTICOM

DOCKET NOS. T-04103A-02-0274 AND T-02565-02-0274

IN THE MATTER OF THE APPLICATION OF OCMC, INC. TO OBTAIN A
CERTIFICATE OF CONVENIENCE AND NECESSITY FROM ONE CALL
COMMUNICATIONS, INC. DBA OPTICOM TO PROVIDE
TELECOMMUNICATIONS SERVICES AS A PROVIDER OF RESOLD
INTEREXCHANGE SERVICES AND ALTERNATIVE OPERATOR SERVICES
WITHIN THE STATE OF ARIZONA

August 23, 2004

TABLE OF CONTENTS


	PAGE
1. INTRODUCTION	1
2. ZERO-MINUS CALL WAIVER	1
3. COMPARISON OF FACILITIES AND CALL COMPLETION PROCEDURES.....	2
4. COMPARISON OF CALL PROCESSING SEQUENCES AND PROCESSING TIMES...	3
5. CONCLUSIONS AND RECOMMENDATIONS	3

ATTACHMENTS:

QWEST CORPORATION RESPONSES TO STAFF'S FIRST SET OF DATA REQUESTS DATED JULY 27, 2004.....	ATTACHMENT 1
OCMC'S RESPONSES TO STAFF'S SECOND SET OF DATA REQUESTS DATED JULY 26, 2004.....	ATTACHMENT 2

STAFF ACKNOWLEDGMENT

The Supplemental Staff Report for OCMC, Inc. and One Call Communications, Inc. d/b/a Opticom, Docket Nos. T-04103A-02-0274 and T-02565A-02-0274, was the responsibility of the Staff member listed below. Del Smith was responsible for the review and analysis of the Applicant's request for a waiver pursuant to A.A.C. R14-2-1006.



Del Smith
Utilities Engineer Supervisor

1. INTRODUCTION

On March 26, 2004, OCMC, Inc. (the "Applicant" or "OCMC") filed an amendment to its application to provide resold interexchange services and alternative operator services. The amendment requested a waiver to Arizona Administrative Code R14-2-1006. The proposed waiver would allow OCMC to complete zero-minus calls, including emergency calls, over its telecommunications network instead of the originating local exchange carrier ("LEC").

On April 26, 2004, Staff filed an amended Staff Report. In this report Staff concluded that although OCMC has the capability to process zero-minus calls quickly and accurately, it failed to provide information required by the rule relating to the manner in which the LEC processes such calls.

A Procedural Order issued on May 24, 2004, ordered OCMC to work with Staff in an effort to provide the information required pursuant to A.A.C. R14-2-1006.B relating to the manner in which the LEC provides zero-minus calls. OCMC was provided 60 days in which to provide the necessary information and Staff was ordered to file the subject supplemental report indicating its recommendation with regard to approval of OCMC's waiver request at the expiration of the 60-day period.

On July 23, 2004, Staff filed a motion to extend the due date for filing its supplemental report. Staff had not received responses to data requests issued in an attempt to elicit the necessary information from OCMC and Qwest Corporation ("Qwest").

A procedural order issued on July 26, 2004, granted Staff's request for a 30-day extension and ordered Staff to file its supplemental report by August 23, 2004.

Staff's review and analysis in this supplemental report addresses OCMC's ability to process zero-minus calls as quickly and accurately as Qwest. Qwest is the predominant LEC operating in the area to be served by OCMC.

2. ZERO-MINUS CALL WAIVER

The term "zero-minus" refers to calls by individuals who dial "0," and wait for the operator to assist in completing the call. The Commission adopted AAC R14-2-1006.A, which requires the AOS provider to route all zero-minus calls to the originating LEC. The Commission also provides for a waiver from the requirement upon a showing that the AOS provider could provide the caller with equally quick and reliable service. On March 26, 2004, OCMC requested such a waiver.

AAC R14-2-1006.B provides for a waiver to subsection A "if the AOS provider has clearly and convincingly demonstrated that it has the capability to process such calls with equal quickness and accuracy as provided by the LEC".

3. COMPARISON OF FACILITIES AND CALL COMPLETION PROCEDURES

Qwest has provided a description of its facilities used to process zero-minus calls and has described its zero-minus call completion procedures.¹ As depicted in the Tables below the facilities and procedures used by OCMC and Qwest are comparable:

<u>Facilities</u>	<u>OCMC</u>	<u>Qwest</u>
authorized to provide zero-minus emergency call completion and operator assisted services in other states	✓	✓
provides 24-hour, seven day a week operator services over its telecommunications network which is equipped with emergency back-up power and redundant equipment	✓	✓
switches have adequate capacity and are monitored at all times and 24-hour on-call technicians are available for needed repairs	✓	✓
live operator centers are staffed to meet seasonal, daily and hourly peak traffic on network	✓	✓
telecommunications network is engineered and maintained for a P.01 grade of service or better	✓	✓

<u>OCMC</u>	<u>Qwest</u>
uses the same zero-minus call completion procedures that it uses in other states	uses the same procedures in other jurisdictions it serves
customers are required to provide emergency phone number information that will be tested at least semi-annually to verify its accuracy	uses automatic number identification information to determine the appropriate emergency phone number information
with a single keystroke the operator equipment provides the operator with the information needed to process an emergency call; the operator need only press a single number to initiate call placement to the emergency service provider requested	the operator equipment provides the operator with the information needed to process an emergency call
the operator remains on the line until the emergency call is successfully completed; the operator will provide location information to the emergency service provider in the event the caller hangs up, is hysterical, or is otherwise non-communicative	the operator provides the caller's number to the emergency service provider and waits for the conversation to begin, the call is then placed on hold, when either or both parties hang up the operator verifies that the call has ended
records are kept on all emergency calls	records are kept on all emergency calls

¹ Information provided in Qwest Corporation's Responses to Staff's First Set of Data Requests dated July 27, 2004.

Based on the above information, Staff believes that OCMC has the capability to process zero-minus calls at a level of accuracy and reliability that is equal to that provided by Qwest.

4. COMPARISON OF CALL PROCESSING SEQUENCES AND PROCESSING TIMES

OCMC and Qwest have provided information on their operator handled call processing sequences and completion times.²

<u>Call Processing Sequence</u>	<u>OCMC</u>	<u>Qwest</u>
after reaching the automated operator caller can press "0" and be connected to a live operator immediately	✓	✓
live operator verifies that the call received is an emergency and the nature of the emergency	✓	✓

<u>Call Processing Times (in seconds)</u>	<u>OCMC</u>	<u>Qwest</u>
average call processing time from the time the caller has dialed zero to the time the caller is connected to a live operator	≤10*	7.9 – 9.6
average call processing time from the time the live operator is connected to the caller to the time the caller is connected with the emergency service provider	time varies	25
operator average work time	**	25
the total average call processing time	< 60	32.9 – 34.6***

* The maximum time is 10 seconds for OCMC to process this segment of the call.

** OCMC did not provide an operator average work time.

*** From 2003 through June 2004 the monthly call processing time for Qwest was between 7.92 and 9.64 seconds with an average work time of 25 seconds.

Due to the vagueness of OCMC's responses Staff can't make an objective comparison between the call processing times of OCMC and Qwest.

5. CONCLUSIONS AND RECOMMENDATIONS

Staff concludes that OCMC has the capability to process zero-minus calls at a level of accuracy and reliability that is equal to that provided by Qwest. Staff believes it could be reasonable to conclude that OCMC's call processing times would be comparable to Qwest's. However, due to the vagueness of OCMC's responses Staff can't make an objective comparison between the call processing times of OCMC and Qwest.

² Information provided in OCMC's Responses to Staff's Second Set of Data Requests dated July 26, 2004, and Qwest Corporation's Responses to Staff's First Set of Data Requests dated July 27, 2004.

OCMC has not met its burden of proof therefore Staff cannot conclude that the requirement of AAC R14-2-1006B has been met. AAC R14-2-1006B provides for a waiver "if the AOS provider has **clearly and convincingly demonstrated** that it has the capability to process such calls with equal quickness . . ." (emphasis added) as the LEC. Even though it is clear that the rule requires that a comparison be made OCMC failed to provide the objective data Staff would need and clearly requested. The same data requests were sent to both OCMC and Qwest regarding call processing times. In addition, the total average call processing time for Qwest was shorter than the time OCMC provided. Until OCMC provides the comparative data needed, Staff can not recommend granting the waiver OCMC has requested.

SERVICE LIST FOR: OCMC, INC. AND ONE CALL COMMUNICATIONS, INC. DBA
OPTICOM
DOCKET NOS. T-04103A-02-0274 AND T-02565A-02-0274

Thomas Campbell, Esq.
Michael Hallam, Esq
40 North Central Ave.
Phoenix, Arizona 85004
Attorney for OCMC, Inc.

Anne C. Bernard
General Counsel
One Call Communications, Inc. d/b/a Opticom
801 Congressional Blvd.
Carmel, IN 46032

Laura Clore
Regulatory Manager
One Call Communications, Inc. d/b/a Opticom
801 Congressional Blvd.
Carmel, IN 46032

Ernest G. Johnson, Esq., Director
Arizona Corporation Commission
Utilities Division
1200 West Washington
Phoenix, Arizona 85007

Christopher C. Kempley, Esq., Chief Counsel
Arizona Corporation Commission
Legal Division
1200 West Washington
Phoenix, Arizona 85007

Lyn Farmer, Esq., Chief Administrative Law Judge
Arizona Corporation Commission
Hearing Division
1200 West Washington
Phoenix, Arizona 85007



Tina M. Colvin
Lead Paralegal
1801 California
Suite 4900
Denver, CO 80202
303-672-2795

303-298-8197 (fax)
Tina.Colvin@qwest.com

July 27, 2004

RECEIVED

VIA OVERNIGHT UPS

JUL 28 2004

Maureen A. Scott
Attorney, Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

AZ CORPORATION COMMISSION
DIRECTOR OF UTILITIES

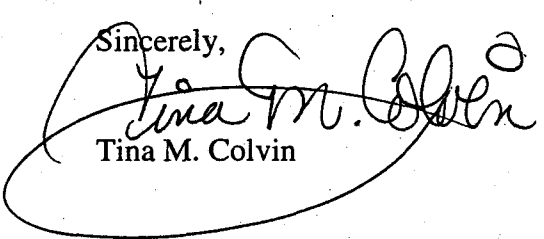
Re: In the Matter of Application to transfer the existing CC&N of One Call
Communications, Inc. d/b/a Opticom to OCMC, Inc.
Docket No. T-04103A-02-0274 and T-02565A-02-0274

Dear Ms. Scott:

Enclosed please find Qwest Corporation's Responses to Staff's First Set of Data Requests to Qwest Corporation in the above-referenced matter.

Should you have any questions, please do not hesitate to contact me at (303) 672-2795.

Sincerely,


Tina M. Colvin

tmc

Enclosures

cc: Norm Curtright, Esq.
Tim Berg, Esq.
Monica Luckritz

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing Qwest Corporation's Responses to Staff's First Set of Data Requests to Qwest Corporation, to be sent via overnight delivery on July 27, 2004, to the following:

Timothy J. Sabo
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

✓ Del W. Smith
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Constance Fitzsimmons
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Maria Maya

Arizona
T-04103A-02-0274 and T-02565A-02-0274
STF 01-001

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 001

Provide a detailed description of the facilities and the procedures that are used to process zero-minus emergency calls. At minimum, your description should address the following:

Facilities

- Where is the live operator center(s) located?
- Is 24-hour seven day a week service provided over a telecommunications network equipped with emergency back-up power and redundant equipment?
- Does adequate capacity exist on the network to handle the expected call volume?
- Is the telecommunications network engineered and maintained for a P.01 grade of service or better?
- Is the network monitored at all times and are 24-hour on-call technicians available for needed repairs?
- Are live operator centers staffed to meet seasonal, daily and hourly peak traffic?

Call completion procedures

- Are the zero-minus emergency call completion procedures used by the Company for the Arizona jurisdiction the same procedures the Company uses for all jurisdictions it serves? If not, please explain.
- Are customers required to provide emergency phone number information and, if so, does the Company take any action to verify its accuracy? If this information is not needed please explain why.
- Does the operator equipment provide the operator with the information needed to process an emergency call? If so, describe the process used by the operator to obtain this information. If this information is not needed please explain why.
- Describe the process used by the operator to initiate call placement to the emergency service provider requested.

- Does the operator remain on the line until the emergency call is successfully completed?
- Does the operator provide location information to the emergency service provider in the event the caller hangs up, is hysterical, or is otherwise non-communicative?
- Are records kept on all emergency calls? What information is kept?

RESPONSE:

Zero Minus calls are routed from the end office, where the customers' local service resides, to the Qwest Operator Services switch that resides in Salt Lake City, Utah. All calls are sent to an automated platform that prompts the customer how to place a call or press "0" for operator assistance. (If customers' press "0" immediately after the automated prompt begins they will be connected to a live operator.)

The Qwest network is engineered and maintained for better than P.01 grade of service and is equipped with emergency back-up power and redundant equipment. The network is monitored at all times with technicians available 24X7X365. The call center is staffed 24X7X365. Weekly staffing schedules are based upon historical and current trends that are revised as appropriate and monitored daily every quarter hour. The call center uses the same procedures for other jurisdictions it serves.

When the customer asks to be connected to an emergency agency and it cannot be determined from their tone of voice or manner if an emergency exists, the Operator will ask; "Is this an emergency?" If the customer's response is yes, the operator will ask for the nature of the emergency, verify the locality and process the call to the emergency agency based upon the back number display and/or customer response and associated emergency agency numbers stored in an operator reference database.

When the agency answers the Operator will provide the customer's number to the agency and wait for conversation to begin between the agency and the customer and place the call on hold at the operator's workstation. When either or both parties hang up, the call will return to the agent to determine if the call has ended; then release the call from the workstation.

The operator completes an emergency memo ticket that includes:

Originating Telephone Number

Number of the Emergency Agency Reached

Time Call Started

Time Call Finished (Agency and/or customer disconnected)

Comments (Information the customer may have provided that describes the nature of the emergency)

Respondent: Judy Lee, Qwest Manager

Arizona

T-04103A-02-0274 and T-02565A-02-0274

STF 01-002

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 002

Describe the call processing sequence that occurs from the time the caller has dialed zero to the time the caller is connected with a live operator. What is the average/typical call processing time (in seconds) for this segment of a zero-minus call?

RESPONSE:

Zero Minus calls are routed from the end office, where the customers' local service resides, to the Qwest Operator Services switch that resides in Salt Lake City, Utah. All calls are sent to an automated platform that prompts the customer how to place a call or press "0" for operator assistance. (If customers' press "0" immediately after the automated prompt begins they will be connected to a live operator.)

From 2003 through June YTD 2004 the monthly call processing time was between 7.92 and 9.64 seconds.

Respondent: Judy Lee, Qwest Manager

Arizona

T-04103A-02-0274 and T-02565A-02-0274

STF 01-003

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 003

Describe the call processing sequence that occurs from the time the live operator has been connected with the caller to the time the caller is connected with the emergency service provider. What is the average/typical call processing time (in seconds) for this segment of a zero-minus emergency call (including operator average work time)?

RESPONSE:

When the customer asks to be connected to an emergency agency and it cannot be determined from their tone of voice or manner if an emergency exists, the Operator will ask; "Is this an emergency?" If the customer's response is yes, the operator will ask for the nature of the emergency, verify the locality and process the call to the emergency agency based upon the back number display and/or customer response and associated emergency agency numbers stored in an operator reference database.

When the agency answers the Operator will provide the customer's number to the agency and wait for conversation to begin between the agency and the customer and place the call on hold at the operator's workstation. When either or both parties hang up, the call will return to the agent to determine if the call has ended; then release the call from the workstation.

From 2003 through June YTD 2004 the monthly call processing time was between 7.92 and 9.64 seconds with an average work time of 25 seconds.

Respondent: Judy Lee, Qwest Manager

Arizona
T-04103A-02-0274 and T-02565A-02-0274
STF 01-004

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 004

What is the operator average work time (in seconds) for a zero-minus emergency call?

RESPONSE:

From 2003 through June YTD 2004 the monthly call processing time was between 7.92 and 9.64 with an average work time of 25 seconds.

Respondent: Judy Lee, Qwest Manager

Arizona

T-04103A-02-0274 and T-02565A-02-0274

STF 01-005

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 005

How many zero-minus emergency calls did the Company receive in 2002, 2003 and 2004 through June 30th ?

RESPONSE:

In 2003, the call center processed 1,828 emergency calls and in 2004, processed 1,259 calls year to date for the State of Arizona. Data is not available for 2002.

Respondent: Judy Lee, Qwest Manager

**LEWIS
AND
ROCA**
— LLP —
LAWYERS

Phoenix Office
40 North Central Avenue
Phoenix, Arizona 85004-4429
Telephone (602) 262-5311
Facsimile (602) 262-5747

Michael T. Hallam
Direct Dial: (602) 262-5340
Direct Fax: (602) 734-3886
E-Mail: mhallam@lrlaw.com
Admitted in Arizona

Tucson Office
One South Church Avenue
Suite 700
Tucson, Arizona 85701-1620
Telephone (520) 622-2090
Facsimile (520) 622-3088

Las Vegas Office
3993 Howard Hughes Parkway
Suite 600
Las Vegas, Nevada 89109
Telephone (702) 949-8200
Facsimile (702) 949-8398

Our File Number 39888-00001

July 26, 2004

VIA HAND DELIVERY

Timothy J. Sabo
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Del W. Smith
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

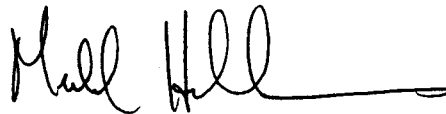
Re: In the Matter of the Application of OCMC, Inc.
Docket No. T-02565A-02-0274

Dear Tim and Del:

Enclosed are OCMC's responses to Staff's Second Set of Data Requests in the above-referenced docket.

If you have any questions, please contact me at (602) 262-5340.

Very truly yours,



Michael T. Hallam

MTH/jw
Enclosures

cc: Ann Bernard (with enclosures)

RECEIVED

JUL 26 2004

**AZ CORPORATION COMMISSION
DIRECTOR OF UTILITIES**

BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman
WILLIAM A. MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner

In the Matter of the Application of)	
OCMC, Inc. to Obtain a Certificate of)	Docket No. T-04103A-02-0274
Convenience and Necessity From One)	
Call Communications, Inc. d/b/a)	Docket No. T-02565A-02-0274
Opticom to Provide Telecommunications)	
Services as a Provider of Resold)	
Interexchange Services and Alternative)	
Operator Services Within the State of)	
Arizona		

OCMC INC.'S OBJECTIONS AND RESPONSES TO
STAFF'S SECOND SET OF DATA REQUESTS

OCMC, Inc. ("OCMC") hereby submits the following objections and responses to the Second Set of Data Requests submitted by Staff of the Arizona Corporation Commission ("Staff").

GENERAL OBJECTIONS TO ALL DATA REQUESTS

1. OCMC objects to each and every Request to the extent it seeks information subject to the attorney-client privilege, work product doctrine or any other privilege recognized by the State of Arizona. In responding to these Requests, OCMC does not waive, but preserves, all such privileges.

2. OCMC objects to each and every Request to the extent it seeks information that is confidential, sensitive, competitive in nature or proprietary to it. In responding to these requests, OCMC does not waive, but preserves, its claim that request for customer and market information is confidential.

3. OCMC objects to each and every Request to the extent that it is unreasonably burdensome, overly broad or not reasonably calculated to lead to the discovery of admissible evidence.

4. OCMC objects to each and every one of Staff's definitions and/or instructions to the extent it purports to abrogate any of OCMC's rights, or add to any of OCMC's obligations under, the Arizona Rules of Civil Procedure or the Commission's Rules.

5. OCMC objects to each and every Request to the extent it is overly broad, unduly burdensome or imposes any burden not expressly permitted under the Commission's Rules or the Arizona Rules of Civil Procedure.

6. OCMC objects to each and every Request to the extent that it calls for information already in the possession, custody and control of Staff.

7. OCMC objects to each and every Request to the extent it seeks information outside of OCMC's possession, custody or control.

8. OCMC expressly reserves the right to supplement or amend its objections and responses as necessary.

OCMC incorporates the foregoing General Objections into each response as if fully set forth therein.

DATED: July 26, 2004.

LEWIS AND ROCA LLP
Thomas H. Campbell
Michael T. Hallam
40 N. Central Avenue
Phoenix, Arizona 85004
(602) 262-5723

Attorneys for OCMC, Inc.

SPECIFIC RESPONSES TO DATA REQUESTS

DWS 1-1 Has the Applicant contacted Qwest or other LECs (ILECs) operating in the areas it seeks to serve to inquire as to what information/data might be available that could be used by Applicant to support its waiver request? Describe the results of any contacts made. If Applicant did not attempt to make these contacts, please explain why not.

Response: OCMC contacted Qwest regarding OCMC's request for waiver and sought data from Qwest. During this contact, Qwest indicated it is willing to release information to the Staff but not directly to OCMC. This information, plus contact information, has been provided to Staff. OCMC has not contacted other LECs because, in its view, Qwest's provision of this service would meet or exceed the standards of other LECs. Further, most of the service at issue is in Qwest's territory.

DWS 1-2 Provide all information/data the Applicant has collected from ILECs or from other sources that supports the subject waiver request. Explain how this information/data demonstrates that the applicant processes zero-minus emergency calls as quickly and accurately as the LEC.

Response: All information that OCMC has received about Qwest has been provided to Staff as stated in response to DWS 1-1.

DWS 1-3 Describe the call processing sequence that occurs from the time the caller has dialed zero to the time the caller is connected with a live operator. What is the average/typical call processing time (in seconds) for this segment of a zero-minus call?

Response: Within one second, the caller reaches the Opticom automated operator. A menu of services is played including pressing 0 for the live operator. If, at anytime, the caller presses 0, they would be connected with a live operator. The maximum time is 10 seconds.

DWS 1-4 Describe the call processing sequence that occurs from the time the live operator has been connected with the caller to the time the caller is connected with the emergency service provider. What is the average/typical call processing time (in seconds) for this segment of a zero-minus emergency call (including operator average work time)?

Response: When the caller reaches the live operator, the live operator asks the caller to explain the situation. The operator tells the caller that the operator will conference them with the proper agency. The operator also tells the caller that he or she will need to stay on the line while the operator dials the appropriate agency. The operator then dials out the call to the proper agency and processes the call. When the emergency agency answers, the

operator adds the caller on the line. The operator remains on the line until the conversation is complete. The operator then completes a ticket to record the information.

The time it takes to process a call from the time the caller reaches the operator until the call is completed varies. On average, Opticom completes its operator service calls in less than 1 minute. Also, the operator stays on the call until the call is complete. The time it takes to obtain the emergency information is instantaneous.

DWS 1-5 What is the operator average work time (in seconds) for a zero-minus emergency call?

Response: Opticom does not keep statistics on this call type. However, Opticom average call processing time for its operator service calls is less than 1 minute per call.

DWS 1-6 Has the Company entered into agreements with the applicable PSAPs for the hand-off of zero-minus emergency calls? If yes, please describe.

Response: No.

DWS 1-7 If the Company's response to DWS 1-6 is no, please describe why the Company believes no such agreements are necessary.

Response: Opticom believes that it has the same information as the PSAP and can efficiently and effectively process the call.